

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

REAHNA CIAMPA,

Plaintiff,

v.

MAGISTRATE JUDGE

Cohen

FORD MOTOR COMPANY,

Defendant.

AMOUNT \$150 51% fed
SUMMONS ISSUED N/A
LOCAL RULES
WAIVER FORM
MCF ISSUED
BY DPTY CLERK
11/10/03 O.M

NOTICE OF REMOVAL

TO: THE CHIEF JUDGE AND JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

The defendant, Ford Motor Company (“Ford”) files this Notice of Removal of the above-captioned action from Suffolk Superior Court, Suffolk County, Commonwealth of Massachusetts, to the United States District Court for the District of Massachusetts. In support of its Notice of Removal, Ford states as follows:

1. As it appears from Docket No. SUCV2003-04998F on file in the Suffolk Superior Court, Plaintiff filed a Complaint on October 30, 2003. A copy of the Summons and Complaint are attached hereto as Exhibit 1 and 2, respectively.
2. Ford was served with the Summons, Complaint, and Civil Action Cover Sheet in this action on November 3, 2003.

3. According to the Complaint, this is a motor vehicle product liability action alleging severe personal injuries and death resulting from an accident involving a Ford Explorer. The Complaint alleges that the Ford Explorer was defectively designed and manufactured, resulting in severe personal injuries to the Plaintiff. As a result of the defendant's alleged negligence, Plaintiff claims she suffered serious and permanent bodily injuries in a rollover accident involving a Ford Explorer.

4. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.00.

5. The plaintiff is a resident of Quincy, Massachusetts.

6. Ford is a Delaware corporation with its principal place of business in Dearborn, Michigan.

7. Jurisdiction is founded on diversity of citizenship between the parties pursuant to 28 U.S.C. § 1332. The amount in controversy, given Plaintiff's alleged damages, exceeds \$75,000.00.

8. This Notice of Removal is being filed within the time period required by 28 U.S.C. § 1446(b).

9. This Notice of Removal was served on counsel of record via regular mail on November 14, 2003 pursuant to 28 U.S.C. § 1446(d).

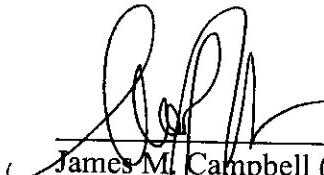
11. A true and correct copy of this Notice of Removal was filed via regular mail on November 14, 2003 with the Clerk of the Suffolk Superior Court.

WHEREFORE, Ford Motor Company prays for removal of the above-captioned matter from the Suffolk Superior Court, Suffolk County, Commonwealth of Massachusetts, to the United States District Court for the District of Massachusetts.

FORD MOTOR COMPANY,

By Its Attorneys,

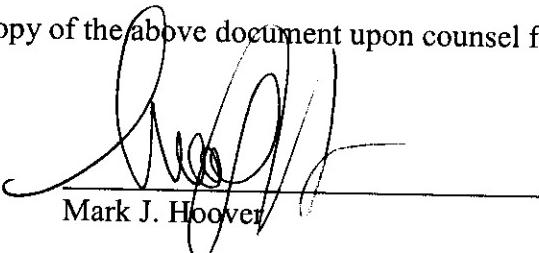
CAMPBELL CAMPBELL EDWARDS
& CONROY, P.C.



James M. Campbell (BBO # 541882)
Mark J. Hoover (BBO # 564473)
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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the above document upon counsel for all parties by mail on November 14, 2003



Mark J. Hoover